**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ADVANCED SILICON TECHNOLOGIES LLC,
 	
    Plaintiff,
 	
v.
 	
NXP SEMICONDUCTORS N.V., NXP B.V., and NXP USA, INC.,
 	
    Defendants.
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	§ Case. No. 6:22-CV-0466-ADA-DTG

**DECLARATION OF ALLEN WAGNER IN SUPPORT OF NXP USA, INC.'S
OPPOSED MOTION FOR INTRA-DISTRICT TRANSFER
TO THE AUSTIN DIVISION OF THE WESTERN DISTRICT OF TEXAS**

I, Allen Wagner, declare as follows:

1.   I make this declaration in support of NXP USA, Inc.'s ("NXP's") Motion for Intra-District Transfer to the Austin Division of the Western District of Texas. I have personal knowledge of the facts set forth herein and, if called upon to testify under oath, I could and would competently testify thereto.

2.   I live in Pittsburgh, PA and my current title is Fellow and Chief Engineer – MCU & MPU Products. I oversee the chip hardware development for the i.MX family of microprocessors. I started with Motorola, Inc. ("Motorola") in 1981 and transitioned to Freescale Semiconductor, Inc. ("Freescale") when it was divested from Motorola. I left Freescale for a short time and moved to SigmaTEL Inc., which was then acquired by Freescale in 2008. I was employed by Freescale when NXP acquired Freescale in 2015. I have been working on i.MX processors for approximately 20 years.

- 1 -

3.   I lead a worldwide team of engineers and engineering leads that design the integrated circuits for the i.MX processers, with the U.S.-based engineers located at NXP's office in Austin. I specifically oversee engineering leads that are in charge of the business unit for the i.MX processors, Business Line-Edge Processing ("BL-EP"), that is headquartered in Austin. Each engineering lead is responsible for orchestrating multi-faceted design projects with teams that range from 50-100 engineers per team. I manage a total of 9 engineering leads, of which 3 engineering leads are U.S-based and are located in Austin and the other 6 engineering leads are abroad. The 3 engineering leads in Austin execute design and development of the i.MX processors from NXP's Austin facilities. For example, the main engineering unit that supplies products to BL-EP is the Microcontroller and Microprocessor Engineering ("MME") and is located in Austin.

4.   Some integrated circuits within the i.MX processors, such as the video decoder and graphics pipelines, are developed by third-parties. One such third party, Verisilicon, develops the Vivante graphics processing unit. Verisilicon's main offices are in Shanghai and San Jose; Verisilicon also has an office Austin which has provided NXP with engineering support. Another third party, Amphion/Allegro DVT, develops a video processing unit that is used in i.MX processors. Amphion/Allegro DVT is headquartered in France.

5.   My team is not the only engineering team in Austin related to i.MX products. For the i.MX processors, test program development includes approximately 60 employees that do product and test engineering. The main site for test program development, including team leadership, is Austin. Likewise, product engineering development is led from and executed in Austin. The software teams, including codec and driver development (led by Jeff Kudrick), comprises about 40 employees and is based in Austin. Applications support teams also include

about 40 employees and are based in Austin. Similarly, quality engineering teams are based in Austin.

6.   NXP's Austin headquarters also houses employees knowledgeable about the sales (led by Ron Martino), sales finance (led by Srinath Rajen), marketing (led by Amanda McGregor), competitive analysis (led by Gowri Chindalore and including a team of 2 employees), and global logistics for the i.MX processors. Austin is also home to employees responsible for relevant financial information, including teams led by Ray Henling, BL-EP Controller, and Tina Wheaton, Chief of Staff and Business Manager BL-EP.

7.   NXP's patent licensing team is also led out of Austin by Lee Chastain and includes 9 employees, with 7 located in Austin.

8.   NXP uses cloud-based repositories for storage of integrated circuit designs and source code, and these repositories can be accessed from NXP's locations in Austin. These repositories for the i.MX processors are maintained by my team of engineering leads, including the engineering leads that work at NXP's facilities in Austin.

9.   Electronic versions of technical documentation relating to the work of the engineering teams is stored on servers in Phoenix and Amsterdam. To the extent hard copies of technical documents for the i.MX products exist, they are maintained by the engineers in Austin.

10.   NXP does not maintain offices or have any official presence in Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, or Somervell counties of the State of Texas. NXP also does not maintain any documents relating to i.MX processors in the counties.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

- 4 -

Executed on September 12, 2022, in Pittsburg, PA

      /s/ ***Allen Wagner***
Allen Wagner